

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN**

<p>DONALD J. TRUMP FOR PRESIDENT, INC., MATTHEW, SEELY, ALEXANDRA SEELY, PHILIP O'HALLORAN, ERIC OSTERGREN, MARIAN SHERIDAN, MERCEDES WIRSING, and CAMERON TARSA,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>JOCELYN BENSON, in her official Capacity as Michigan Secretary of State, MICHIGAN BOARD OF STATE CANVASSERS, WAYNE COUNTY, MICHIGAN, and WAYNE COUNTY BOARD OF COUNTY CANVASSERS,</p> <p style="text-align: center;">Defendants,</p> <p>and</p> <p>DEMOCRATIC NATIONAL COMMITTEE, MICHIGAN DEMOCRATIC PARTY, CITY OF DETROIT, THE MICHIGAN STATE CONFERENCE NAACP, WENDELL ANTHONY, YVONNE WHITE, and ANDRE WILKES,</p> <p style="text-align: center;">Intervenor-Defendants.</p>	<p>No. 1:20-cv-01083</p> <p>Judge Janet T. Neff</p>
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W.D. MICH. LCIVR 7.3(b)(ii) CERTIFICATE OF WORD COUNT

Pursuant to W.D. Mich. LCivR 7.3(b)(ii), the undersigned counsel certifies that the brief filed in support of the Motion to Strike by Intervenor City of Detroit consists of 44 words.

November 19, 2020

Respectfully submitted,

FINK BRESSACK

By: /s/ David H. Fink
David H. Fink (P28235)
Darryl Bressack (P67820)
Nathan J. Fink (P75185)

Attorneys for City of Detroit
38500 Woodward Ave., Ste. 350
Bloomfield Hills, MI 48304
Tel: (248) 971-2500
dfink@finkbressack.com
dbressack@finkbressack.com
nfink@finkbressack.com

**CITY OF DETROIT
LAW DEPARTMENT**

Lawrence T. Garcia (P54890)
Charles N. Raimi (P29746)
James D. Nosedo (P52563)
Attorneys for City of Detroit
2 Woodward Ave., 5th Floor
Detroit, MI 48226
Tel: (313) 237-5037
garcial@detroitmi.gov
raimic@detroitmi.gov
nosej@detroitmi.gov